1 The Honorable Jamal N. Whitehead 2 3 4 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 THE DUWAMISH TRIBE and CECILE 10 Case No. 22-cv-00633-JNW HANSEN, 11 STIPULATED MOTION FOR Plaintiffs. EXTENSION AND ORDER 12 v. 13 NOTED ON MOTION CALENDAR: DEB HAALAND, BRYAN NEWLAND, US April 21, 2023 14 DEPARTMENT OF THE INTERIOR, BUREAU OF INDIAN AFFAIRS, OFFICE 15 OF FEDERAL ACKNOWLEDGEMENT, and UNITED STATES OF AMERICA, 16 Defendants. 17 18 19 STIPULATED MOTION 20 In accordance with the Court's Order Granting in Part Plaintiffs' Motion to Complete the 21 Administrative Record, Dkt. # 38 at 7, and pursuant to Local Civil Rules 7(j), 10(g), and 16(b)(6), 22 Plaintiffs and Federal Defendants (collectively, the "Parties") respectfully request an extension of 23 the current case schedule (Dkt. #51). 24 On April 7, 2023, Plaintiffs notified Federal Defendants of potential deficiencies regarding 25 26 the Administrative Record, namely potential deficiencies in the privilege log provided by STIPULATED MOTION FOR EXTENSION AND ORDER - 1 CASE NO. 22-CV-00633-JNW

Defendants, in accordance with the operative deadline. *See* Dkt. # 51 at 2. Plaintiffs also proposed a brief extension of the current case schedule to provide Federal Defendants sufficient time to update and complete the privilege log. By April 12, Federal Defendants had provided the updated privilege logs. To provide Plaintiffs with sufficient time to review and address those updated privilege logs, the Parties stipulated to brief extensions of the current case schedule, including an extension of the deadlines for Plaintiffs to make specific objections regarding the Administrative Record (to April 19, 2023) and for Defendants to respond to that deadline (to May 3, 2023). For these reasons, good cause exists to extend the deadlines pursuant to Local Civil Rule 16(b)(6).

The Parties respectfully request to extend the current case schedule, as follows:

	Current Deadline	Proposed Deadline
Plaintiffs shall notify	April 7, 2023	April 7 & 19, 2023
Defendants of any		
potential deficiencies		
regarding the		
Administrative		
Record		
Defendants shall	April 14, 2023	May 3, 2023
respond to Plaintiffs'		
notice		
Parties shall meet and	April 21, 2023	May 5, 2023
confer regarding		
Administrative		
Record		
Deadline for	n/a	May 10, 2023
Defendants to provide		
final response		
regarding potential		
Administrative		
Record deficiencies		
Deadline for Plaintiffs	May 4, 2023	May 17, 2023
to move for relief		
regarding the		
Administrative		
Record (LCR 7(d)(3)		
shall govern the		

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1	1 motion briefing schedule)				
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3					
4	Considering the foregoing, the Parties respectfully move the	Court to extend the case			
5	schedule. Pursuant to Local Civil Rule 10(g), at the close hereof is	schedule. Pursuant to Local Civil Rule 10(g), at the close hereof is a proposed order granting this			
6 7	stipulated motion				
8	DATED (1: 21 (1 CA :1 2022	DATED this 21st day of April, 2023.			
9					
10	10				
11	Respectfully Submitted,				
12					
13	13 K&L GATES LLP				
14					
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16	J. Timothy	J. Angelis, WSBA # 30300 / Hobbs, WSBA # 42665			
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ORDER

Upon consideration of the Parties' Stipulated Motion for Extension, the Court finds that good cause exists to extend certain deadlines in the current case schedule (Dkt. # 51), and it is hereby **ORDERED** that the Motion is **GRANTED** *nunc pro tunc*.

It is **FURTHER ORDERED** that the current case schedule will be modified as follows:

Plaintiffs shall notify Defendants of any potential deficiencies regarding the Administrative	April 7, 2023	April 7 & 19, 2023
Record		
Defendants shall respond to Plaintiffs' notice	April 14, 2023	May 3, 2023
Parties shall meet and confer regarding Administrative Record	April 21, 2023	May 5, 2023
Deadline for Defendants to provide final response regarding potential Administrative Record deficiencies	n/a	May 10, 2023
Deadline for Plaintiffs to move for relief regarding the Administrative Record (LCR 7(d)(3) shall govern the motion briefing schedule)	May 4, 2023	May 17, 2023

IT IS SO ORDERED.

DATED this 5th day of May, 2023.

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1 2 Jamal N. Whitehead 3 United States District Judge 4 5 PRESENTED BY: 6 **K&L GATES LLP** 7 8 By: s/Bart J. Freedman 9 Bart J. Freedman, WSBA # 14187 10 Theodore J. Angelis, WSBA # 30300 J. Timothy Hobbs, WSBA # 42665 11 Benjamin A. Mayer, WSBA # 45700 Endre M. Szalay, WSBA # 53898 12 Shelby R. Stoner, WSBA # 52837 Natalie J. Reid, WSBA # 55745 13 Courtney A. Neufeld, WSBA # 60154 14 925 Fourth Avenue **Suite 2900** 15 Seattle, Washington 98104-1158 Tel: +1 206 623 7580 16 Fax: +1 206 623 7022 Emails: bart.freedman@klgates.com 17 theo.angelis@klgates.com 18 tim.hobbs@klgates.com ben.mayer@klgates.com 19 endre.szalay@klgates.com shelby.stoner@klgates.com 20 natalie.reid@klgates.com courtney.neufeld@klgates.com 21 22 Attorneys for Plaintiffs 23 24 25 26 STIPULATED MOTION FOR EXTENSION AND ORDER - 6

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